



217/782-6762

Log No. C-480

Received: March 2, 1989

Refer to: 0438050004 -- DuPage County
Naperville/AT&T Bell Laboratories
ILD068608314
RCRA-Closure

April 6, 1989

AT&T
ATTN: Paul E. Wyszowski
101 John F. Kennedy Parkway
Short Hills, New Jersey 07078-0905

Mr. Wyszowski:

The closure plan submitted by yourself has been reviewed by this Agency. Your partial closure plan to close the hazardous waste container (S01) storage area is hereby approved subject to the following conditions.

1. Closure activities must be completed by October 1, 1989. When closure is complete the owner or operator must submit to the Agency certification both by the owner or operator and by an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan. This certification must be received at this Agency within sixty (60) days after closure, or by December 1, 1989.

The attached closure certification form must be used. Signatures must meet the requirements of 35 Ill. Adm. Code Section 702.126. The independent engineer should be present at all critical, major points (activities) during the closure. These might include soil sampling, soil removal, backfilling, final cover placement, etc. The frequency of inspections by the independent engineer must be sufficient to determine the adequacy of each critical activity. Financial assurance must be maintained for the units approved for closure herein until the Agency approves the facility's closure certification.

The Illinois Professional Engineering Act (Ill. Rev. Stat., Ch. 111, par. 5101 et. seq.) requires that any person who practices professional engineering in the State of Illinois or implies that he (she) is a professional engineer must be registered under the Illinois Professional Engineering Act (par. 5101, Sec. 1). Therefore, any certification or engineering services which are performed for a closure plan in the State of Illinois must be done by an Illinois P.E.

Plans and specifications, designs, drawings, reports, and other documents rendered as professional engineering services, and revisions of the above must be sealed and signed by a professional engineer in accordance with par. 5119, sec. 13.1 of the Illinois Professional Engineering Act.

3rd copy



As part of the closure certification, to document the closure activities at your facility, please submit a Closure Documentation Report which includes:

- a. The volume of waste and waste residue removed. The term waste includes wastes resulting from decontamination activities.
 - b. A description of the method of waste handling and transport.
 - c. The waste manifest numbers.
 - d. Copies of the waste manifests.
 - e. A description of the sampling and analytical methods used.
 - f. A chronological summary of closure activities and the cost involved.
 - g. Color photo documentation of closure. Document conditions before, during and after closure.
 - h. Tests performed, methods and results.
2. This facility must continue to meet the applicable requirements of 35 IAC - Subtitle G for those units identified on the Part A application i.e. tank (S02) storage unit not approved for closure herein.
 3. The approval of this partial closure plan does not relieve AT&T Bell Laboratories of the responsibility of providing financial assurance for the remainder of the facility which is subject to closure, in accordance with 35 IAC Section 725.243.
 4. Enclosed is a Part A application form. In accordance with 35 Ill. Adm. Code Section 703.152 and 703.155, closure of your container (S01) storage unit requires modification of your Part A application. Please complete this form and submit it with your closure certification.
 5. If the Agency determines that implementation of this closure plan fails to satisfy the requirements of 35 Ill. Adm. Code, Section 725.211, the Agency reserves the right to amend the closure plan. Revisions of closure plans are subject to the appeal provisions of Section 40 of the Illinois Environmental Protection Act.
 6. A revised cost estimate and financial assurance instruments should be submitted with the closure certification documents.



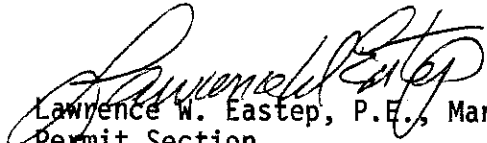
7. Under the provisions of 29 CFR 1910 (51 FR 15,654, December 19, 1986), cleanup operations must meet the applicable requirements of OSHA's Hazardous Waste Operations and Emergency Response standard. These requirements include hazard communication, medical surveillance, health and safety programs, air monitoring, decontamination and training. General site workers engaged in activities that expose or potentially expose them to hazardous substances must receive a minimum of 40 hours of safety and health training off site plus a minimum of three days of actual field experience under the direct supervision of a trained experienced supervisor. Managers and supervisors at the cleanup site must have at least an additional eight hours of specialized training on managing hazardous waste operations.
8. Approval of this closure plan for the container (S01) storage unit closing at this time in no way approves or disapproves the closure plan as it relates to the tank (S02) storage unit units that are not closing at this time. Prior to initiating closure activities for that unit(s), a closure plan must be submitted to and approved by this Agency.
9. The concrete surfaces shall be visually inspected, photographed and any residue adhering to the surface must be removed by scraping and/or brushing. Following this, the concrete surfaces must be steam cleaned and triple rinsed. All wash and rinse water shall be collected. If analysis of the wash or rinse water samples detect the presence of F001, F002 or F005 then that material must be managed as a hazardous waste. If the wash or rinse water samples exhibit a characteristic of hazardous waste then that material must be managed as a hazardous waste. In any event the material must be managed as a special waste. If, after cleaning the concrete surfaces, any cracks, joints or other defects are found that would allow waste to migrate through the concrete into the underlying soil, a closure plan modification request addressing soil sampling at those locations must be submitted to this Agency within sixty (60) days of such a finding.
10. 35 IAC 721.131 F001 through F005 wastes must be disposed in accordance with 35 IAC Part 728.



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Should you have any questions regarding this matter, please contact Eugene W. Dingledine at 217/782-5504.

Very truly yours,


Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:EWD:dls/1106k,98-101

Attachment

cc: Maywood Region
Division File - RCRA Closure
Andy Vollmer
USEPA Region V -- George Hamper
USEPA Region V -- Mary Murphy
Compliance Section



ATTACHMENT

This statement is to be completed by both the responsible officer and by the registered professional engineer upon completion of closure. Submit one copy of the certification with original signatures and three additional copies.

Closure Certification Statement

Closure Log C-480

The hazardous waste management S01 unit at the facility described in this document has been closed in accordance with the specifications in the approved closure plan. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

USEPA ID Number

Facility Name

Signature of Owner/Operator

Name and Title

Signature of Registered P.E.

Name of Registered P.E. and Illinois
Registration Number

Date

EWD:dls/1106k,102



Illinois Environmental Protection Agency · P.O. Box 19276, Springfield, IL 62794-9276

217/782-6762

Refer to: 0438050004 -- DuPage County
AT&T Bell Laboratories
Closure Plan Approved: March 2, 1989
Closure Log # C-480
ILDO68608314
RCRA CLOSURE

January 4, 1990

AT&T Bell Laboratories
Attn: Paul E. Wyszowski
101 John F. Kennedy Parkway
Short Hills, New Jersey 07078-0905

Dear Mr. Wyszowski:

This letter will acknowledge receipt of the closure certification dated October 24, 1989 and received by the Agency on November 1, 1989.

According to 35 Ill. Adm. Code, Section 725.215, certification of closure is to be provided in accordance with specifications in the approved closure plan. The approved closure plan for this facility consists of the plan which was submitted by MAECORP Inc. dated February 27, 1989 and the conditions of the April 6, 1989 letter from Lawrence W. Eastep, P.E.

The Agency has determined that the closure of the container storage area (S01) was not conducted in accordance with the approved closure plan and is hereby disapproved for the following reasons:

Condition #9 of the April 6, 1989 closure plan approval letter requires that "if analysis of the wash or rinse water sample detected the presence of F001, F002 or F005, then that material must be managed as a hazardous waste." The analysis of the wash/rinse water sample detected toluene, an F005 solvent, at concentrations of 5.1 ppm. This material was manifested off-site on August 31, 1989 as a non-hazardous waste.

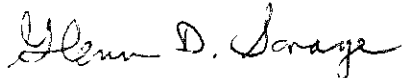
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Please submit in writing, within fifteen (15) calendar days of the date of this letter, the reasons for your failure to follow the approved closure plan and a description of the steps which have been taken to insure that this problem does not reoccur. The written response and two copies of all documents submitted in reply to this letter should be sent to the following:

Illinois Environmental Protection Agency
Attn: Glenn Savage, Manager
Field Operations Section
Division of Land Pollution Control
2200 Churchill Road
P.O. Box 19276
Springfield, Illinois 62794-9276

Should you have questions regarding this matter, please contact Chuck Gruntman at 708/345-9780.

Very Truly Yours,



Glenn D. Savage, Manager
Field Operations Section
Division of Land Pollution Control

GDS:CJG:TJM

cc: Maywood Region
Division File
USEPA Region V - George Hamper
Dale Montgomery, P.E.
Andy Vollmer
Compliance Section
Permit Section
Enforcement Section